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July 19, 2007

Mr. Brian Wootton
Hydrogeologist
NCDENR – Solid Waste Section
1646 Mail Service Center
Raleigh, North Carolina, 27699-1646

RE: Coble's Sandrock C&D Landfill, Alamance County
Permit # 01-05 - Phase 3 Expansion
Response to DENR Comments #2
JEI Project No. 419.00; Task 27

Dear Brian:

This letter is in response to your letter dated July 3, 2007, which requested additional information regarding the Site Suitability Report and Hydrogeologic Report for the Coble's Sandrock C&D Landfill Phase 3 Expansion. Three copies of the revised drawings and other attachments to this letter are included. Following is a point-by-point response to your questions and comments in the July 3, 2007 letter.

DENR Comment #1:
Volume 1, Section 1 – Site Suitability Report
Drawing No. 03 – Proposed Facility Boundary & Waste Footprint

This map depicts a private dwelling with a water supply well adjacent to the eastern property boundary. There is a 500 feet buffer radius drawn from the residence. A portion of this 500 feet buffer meets the proposed waste boundary, which is near the facility scale house. The water supply well associated with this private residence actually measures 465 feet from the southeastern portion of the proposed waste boundary. Please clarify the distance between this water supply well and the southeastern proposed waste boundary, and if necessary, modify the waste boundary to meet the 500 feet buffer requirement between water supply wells(s) and waste boundary.

This map also depicts several structures and a decommissioned well within the proposed 200 feet buffer at the southwest portion of the property. What is the present status of these structures (abandoned, demolished, inactive) and the current use of these structures if active (i.e. part of the facility, residence, etc.)? Please modify waste boundary if necessary.

Also, modify this drawing to show locations of borings/piezometers/monitoring wells that have been installed recently to coincide with the drawings included in the Hydrogeologic Report (Volume 1, Section 2).

The supply well in question was not accurately located on the site map. A more accurate location was obtained by triangulation, measuring the distance to the well from the edge of the road pavement, the edge of the paved driveway, and the front of the house. The location of this well on this and other drawings has been corrected. The actual location of this well is 515 feet from the nearest corner of the proposed waste boundary, so the buffer requirements are satisfied.

The structures on the southwest portion of the property are a former residence (mobile home) and associated outbuildings, which are abandoned and have not been used for anything in several years. The supply well associated with the former residence (WW-1) still exists, but is disconnected and not in use as a water source, although it has been measured for water levels. This well will be properly abandoned prior to violation of the buffers specified in Rule .0503(2)(f)(ii), as stated in Section 3.5.2 (Page 16) of the Hydrogeologic Report.

Drawing Number 03 has been modified to show all recently installed borings, piezometers, and monitoring wells, as requested. A copy of the revised drawing is included in the attachments to this letter.

DENR Comment #2:
Volume 1, Section 1 – Site Suitability Report
Map 4 – Survey Plat of Property Boundaries and Facility Boundary

The North arrow on this map is reversed compared to the other maps and drawings in the report. Please modify.

Map 4 has been modified. The north arrow now points north. A copy of the revised map is included in the attachments to this letter.

DENR Comment #3:
Volume 1, Section 1 – Site Suitability Report
Drawing No. 03 – Proposed Facility Boundary & Waste Footprint
Volume 1, Section 2 – Hydrogeologic Report
Drawing DH-2 through DH-6

Drawing DH-2 through DH-6 in the Hydrogeologic Report depict a larger facility boundary and more total acreage (182.2 acres) when compared to the facility boundary shown on Drawing No. 3 (154.0 total acres) in the Site Suitability Report. Modify the Drawings in the Hydrogeologic Report to have the same facility boundary and acreage as depicted on Drawing No. 3.

Drawings DH-2 through DH-6 have been revised to show the proper facility boundary, matching the acreage shown on Drawing 3. Copies of the revised drawings are included in the attachments to this letter.

DENR Comment #4:
Volume 1, Section 2 – Hydrogeologic Report
Section 4.0 Groundwater Monitoring Plan

Section 4.1 of Page 18 states, in part: "The plan complies with Section .0600 of the North Carolina Solid Waste management Rules, which specifies the requirements for groundwater and surface water monitoring at C and D landfills". Please revise portions of the Groundwater Monitoring plan to reflect and adhere to the new C&D rules (.0544).

This sentence has been revised to read: "The plan complies with Section .0544 of the North Carolina Solid Waste management Rules, which specifies the requirements for groundwater and surface water monitoring at C and D landfills". The details of the Groundwater Monitoring Plan, as presented in our revised Hydrogeologic Report, dated June 2007, reflect and adhere to the new rules. A copy of the revised Page 18 is included as an attachment to this letter.

If you have any further questions or comments regarding this application or other issues concerning this site, please email me at me at vburbach@joyceengineering.com or call me at (336) 323-0092. We appreciate all of your input on this project and look forward to working with you in the future.

Sincerely,
JOYCE ENGINEERING, INC.

Van Burbach, Ph.D., PG
Senior Project Hydrogeologist

Copy: Kent Coble, Coble's Sandrock
JEI File

Attachments: Revised Drawing 3
Revised Map No. 4
Revised Drawings DH-2 through DH-6
Revised Page 18 of Hydrogeologic Report

4.0 GROUNDWATER MONITORING PLAN

4.1 Introduction and Purpose

This plan shall replace any previous groundwater monitoring plans that may have been submitted for Coble's Sandrock C and D Landfill. This Groundwater Monitoring Plan will serve as a guidance document for collecting and analyzing groundwater and surface water samples, managing the associated analytical results, and monitoring for potential releases to the uppermost aquifer from the Coble's Sandrock C and D Landfill. The plan complies with Section .0540 of the North Carolina Solid Waste Management Rules, which specifies the requirements for groundwater and surface water monitoring at C and D landfills. The plan also addresses the specific issues addressed in the Solid Waste Section's January 1995 policy memorandum (*Re: Sampling and Analysis Requirements, Construction and Demolition Landfills and Closed Sanitary Landfills*).

4.2 Groundwater Monitoring Network

The groundwater monitoring network is designed to monitor for potential releases to the uppermost aquifer at the proposed site. The boring log and well completion details for all of the existing groundwater monitoring wells are included as Appendices DH-1 and DH-2 to this report. A summary of well construction specifications, well status, and the role of each well in the proposed monitoring plan is provided in Table 10.

4.2.1 Background and Compliance Monitoring Wells

Monitoring well MW-6 (formerly P-3) is proposed to remain as the upgradient background monitoring well for the facility. This well was installed during site characterization activities in August 1997. Although installed as a piezometer, it was constructed to meet the requirements for a long term monitoring point. A protective casing was added to this well during field activities performed in January 2002. This well replaced MW-3 as the facility background well before the November 2003 sampling event. Monitoring wells MW-2, MW-4, and MW-7 are proposed to remain as downgradient compliance wells. Wells MW-2 and MW-4 were installed during the original permitting activities in 1997. Well MW-7 replaced MW-5 at the request of the Solid Waste Section before the November 2003 sampling event. Newly installed monitoring wells MW-8 and MW-10S are proposed to become additional downgradient compliance wells. MW-9 will need to be abandoned for construction of a proposed sediment basin; therefore, piezometer P-19S will be converted to compliance well to replace MW-9. Wells MW-1 and MW-3 will be abandoned for the construction of the proposed Phase 3A disposal area. Well MW-5 will continue to be used for the collection of groundwater level data. In addition, a new monitoring well, MW-11, will be installed northwest of the proposed Phase 3B disposal area prior to any waste being received into Phase 3B. Thus, the proposed compliance network will include the following eight wells: MW-2, MW-4, MW-7, MW-6 (background), MW-8, MW-10S, P-19S, and MW-11. The proposed monitoring well network is shown on Drawing DH-8.